

EXHIBIT E

(April 29, 2022 E-mail from M. Moore to L. Aden)

From: [Moore, Mark C.](#)
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Bcc: ["South Carolina House of Representatives 063947 00003 Stage 3 Potential Litigation E Mails"](#)
Subject: RE: SC NAACP, et al v. Alexander - Plaintiff's Proposed Exhibit List [IWOV-NPCOL1.FID2240915]
Date: Friday, April 29, 2022 1:44:57 PM

Leah:

Thanks for your email and for the description of your proposed exhibits. While the Parties have not discussed an exchange of proposed exhibit lists nor is there a requirement in our scheduling order, we are happy to collaborate on trial exhibits and to schedule a “meet and confer” on each party’s exhibit plans. While we can provide our proposed exhibits today so that you have the information, please note that Local Rule (LR) 26.07 is not implicated here.

As you may have noted, LR 26.07(A) sets a time period for a meet and confer no less than 7 days prior to the date set for the filing of pretrial briefs—which is not provided for in this case as the Court specifically declined to require filing of pretrial briefs. The absence of such a pre-trial exchange is also not surprising given that here discovery is not yet complete and if the deadlines in LR 26.07(A) had been triggered, LR 26.07(C) would have required the exchange of proposed exhibit lists by all parties and the “physical exchange of exhibits” *before* the 7 day period contemplated by LR 26.07(A).

We do, however, see benefit to the contemplated “meet and confer” and can be scheduled in short order. Let us know when you’d like to discuss.

Best,

Mark

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From: Leah Aden <laden@naacpldf.org>
Sent: Thursday, April 28, 2022 11:46 PM

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Subject: RE: SC NAACP, et al v. Alexander - Plaintiff's Proposed Exhibit List

{EXTERNAL EMAIL}

Counsel –

Attached please find Plaintiffs' proposed exhibit list pursuant to the Court's local rules. We look forward to a meet and confer to discuss defendants' responses and any objections to these proposed exhibits.

(end)

leah

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